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To Deborah Finger/ARTD/R7/USEPA/US@EPA

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Subject Info

Hi Deborah:

Sorry about the delay in sending this to you. I've just been swamped.

Here is the link to the June 12, 2002 Federal Register where we explain that businesses and organizations that take electronics out of service are not waste generators because it requires persons with specialized expertise (such as recyclers) to make decisions about whether electronics can be reused. This policy statement is a statement of existing policy--not of proposed policy, even though it appears in the preamble to a proposed rule. In effect, we are saying that we are assuming that electronics have the potential to be reused, and are therefore not wastes, unless a person determines that they must be recycled or disposed and/or acts to recycle or dispose them. Page 40511 provides the explanation of this policy for CRTs and CRT devices. Page 40512 makes it clear that we apply the same policy to any other types of electronics. [All of this same rationale would apply to individuals (rather than just businesses and organizations), but electronics from households are already exempt due to the household waste exemption.] Here is the link:

<http://www.epa.gov/fedrgstr/EPA-WASTE/2002/June/Day-12/f13116.pdf>

In our conversation the other day, you mentioned A-Tec, and that you were not familiar with them as electronics recyclers. Although I know nothing about A-Tec, their website says that they are electronics recyclers, including CRTs and computers. Here is the link:

<http://www.a-tec-recycling.com/>

Finally, the following is some info about CRT processing and CRT glass that I have provided to a number of people who are asking basic questions about CRT glass recycling. Perhaps this info is helpful to you:

If the CRTs or CRT glass are going to glass-to-glass recycling:

The glass must be broken into pieces (called "cullet"), sorted as to glass type, and coatings removed before a CRT glass furnace will take it for use as a raw material in the production of new CRTs. All of the remaining CRT glass furnaces in the world are in Asia--there are about 15 of them in India, China, Malaysia, Thailand, and South Korea.

If the CRT glass is not sorted and cleaned in the U.S., then this processing must take place overseas prior to use by the glass furnace. Export of CRTs or CRT glass for recycling that has not been sorted or cleaned in the U.S. falls under the EPA CRT rule and requires a notification and consent procedure. Notification must be filed with EPA and consent must be provided in writing by the importing country before the CRTs or CRT glass can be exported.

There are at least 3 glass processors in the U.S. who specialize in handling CRTs and CRT glass. All 3 of these processors sort and clean CRT glass. My identification of these CRT glass processors in no way suggests any endorsement of these specific processors. You can get contact information by looking at their websites.

Amandi Services--now called Eco International (multiple locations in the U.S., one location in Mexico)
Dlubak Glass (locations in Ohio and Arizona)

RCRA



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CRT Processing Corporation (one location in Wisconsin)

If the CRTs or CRT glass are going to lead smelting:

If going to a lead smelter, sorting and cleaning are not necessary. Thus, CRT glass that is sent for lead smelting is mixed, dirty glass. A number of U.S. recyclers shred whole computer monitors, resulting in a mixed, dirty glass that is contaminated with some metals, and can only go to smelting rather than glass-to-glass recycling.

The primary destinations for U.S. CRT glass going to lead smelters:

Doe Run lead smelter, Missouri

Xstrata lead smelter, New Brunswick, Canada (export notification and consent required)

There are also a number of smaller-volume lead smelters in the U.S. that may take some CRT glass

If I can be of further help, let me know.

Bob

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